

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in The U.S.  
DISTRICT COURT at Seattle, Washington.

147-21-2007  
By BRUCE RIFKIN, Clerk  
Deputy

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUMBERTO A. REYES-RODRIGUEZ

a/k/a Tony Reyes,  
ALEXIS IKILIKYAN,  
a/k/a Haikanush Ikilikyan,  
WILLIAM S. POFF,  
MICKI S. THOMPSON, and  
MARIO A. MARROQUIN,

Defendants.

CR09 0160 JLR

INDICTMENT



09-CR-00160-INDI

FILED UNDER SEAL

The Grand Jury charges:

COUNT ONE

(18 U.S.C. § 1349 - Conspiracy to Commit Bank and Wire Fraud)

1. Beginning at a time unknown, but not later than August of 2004, and continuing through at least February of 2009, in King, Pierce, and Snohomish Counties, within the Western District of Washington, and elsewhere, the defendants, HUMBERTO A. REYES-RODRIGUEZ, a/k/a Tony Reyes, ALEXIS IKILIKYAN, a/k/a Haikanush Ikilikyan, WILLIAM S. POFF, MICKI S. THOMPSON, and MARIO A. MARROQUIN did knowingly and intentionally conspire, combine, confederate and agree among

1 themselves, and with other persons both known and unknown to the grand jury, to commit  
 2 Bank Fraud, in violation of Title 18, United States Code, Section 1344; and Wire Fraud,  
 3 in violation of Title 18, United States Code, Section 1343.

4 **A. INTRODUCTION**

5 At all times relevant to this indictment, unless otherwise specified:

6 2. Defendant HUMBERTO A. REYES-RODRIGUEZ, a/k/a Tony Reyes  
 7 (hereinafter "TONY REYES"), was a licensed real estate agent in the State of  
 8 Washington, and also worked as a mortgage loan originator.

9 3. Defendant ALEXIS IKILIKYAN, a/k/a Haikanush Ikilikyan, was a licensed  
 10 real estate agent in the State of Washington, and also worked as a mortgage loan  
 11 originator.

12 4. Defendant WILLIAM S. POFF, the ex-husband of ALEXIS IKILIKYAN,  
 13 was a licensed Notary in the State of Washington, and worked as a mortgage loan  
 14 originator.

15 5. Defendant MICKI S. THOMPSON was a salaried employee of Great  
 16 American Escrow ("GAE"), a licensed Escrow Company in Washington State. GAE was  
 17 engaged in the business of acting as an intermediary to facilitate the purchase and sale of  
 18 real property. GAE, through the actions of its employee MICKI S. THOMPSON, and  
 19 others, prepared, obtained and delivered written instruments, money, evidence of title,  
 20 and other things of value to complete or close real property transactions conducted in  
 21 furtherance of the conspiracy. For all transactions for which it is known that GAE was  
 22 used for escrow and closing services, MICKI S. THOMPSON acted as the closing  
 23 officer, also referred to as the "escrow closer."

24 6. Defendants ALEXIS IKILIKYAN and WILLIAM S. POFF caused the  
 25 filing of Articles of Incorporation with the Washington Secretary of State's Office  
 26 incorporating the following companies: *Fidelis Investments, LLC; Fidelis Management,*  
 27 *LLC; Fidelis Holdings LLC; US Mortgage and Investments; New Hope Homes;*  
 28 *The Plantation LLC; Plantation; and US Realty and Investments.* The corporate filings

1 identify either ALEXIS IKILIKYAN or WILLIAM S. POFF, or both, as these  
 2 corporations' shareholders and sole officers for all positions. These corporations were  
 3 engaged in the business of originating mortgage loans, and packaging and submitting loan  
 4 applications and related documents for funding to lenders. IKILIKYAN and POFF  
 5 submitted loan originator/broker applications to the State of Washington to facilitate this  
 6 activity.

7 7. Defendants ALEXIS IKILIKYAN and WILLIAM S. POFF caused the  
 8 filing of Articles of Incorporation with the Washington Secretary of State's Office  
 9 incorporating the following businesses: *4509 South Union Rental Property LLC; 3202*  
 10 *South 130th Rental Property LLC; 9403-9405 94th Rental Property LLC; 9415-9414 94th*  
 11 *Rental Property LLC; 9422-9420 94th Rental Property LLC; 9707-9709 94th Rental*  
 12 *Property LLC; 8715 Dolly Madison Rental Property LLC; 1317 West Mount Rental*  
 13 *Property LLC; 1726 East 3rd Rental Property LLC; 2703 50th Rental Property LLC;*  
 14 *3821 345th Rental Property LLC, 21914 29th Rental Property LLC; 21908 29th Rental*  
 15 *Property LLC; 8101 South 19th Rental Property LLC; 8906 Colgate Rental Property*  
 16 *LLC.* The corporate filings identify either ALEXIS IKILIKYAN or WILLIAM S. POFF,  
 17 or both, or another of their companies as the corporations' shareholders and sole officers  
 18 for all positions.

19 8. Countrywide, GMAC, ING Bank, Bear Stearns Residential Mortgage Corp.,  
 20 EMC Mortgage, Wachovia Bank, Bank of America, Pierce Commercial Bank, Golf  
 21 Saving Bank, Washington Mutual, Aurora Bank FSB, and Boeing Employee's Credit  
 22 Union were, at the relevant time, financial institutions as defined in Title 18, United  
 23 States Code, Section 20.

#### 24 **B. PURPOSE OF THE CONSPIRACY**

25 9. The purpose of the conspiracy was to defraud financial institutions and  
 26 other lenders by, among other things: (a) locating residential real properties that were  
 27 available for purchase and purchasing them, often using straw buyers; (b) orchestrating  
 28 subsequent sales and purchases of the same properties to other members of the conspiracy

1 or straw buyers; (c) falsely inflating the value of the properties, (d) submitting false and  
2 fraudulent mortgage loan applications, title documentation, and related documents to  
3 financial institutions and other lenders, thereby causing lenders to make loans;  
4 (e) creating false and fraudulent documents intended to conceal the diversion of loan  
5 proceeds to the defendants; (f) obtaining commissions and fees from the completed  
6 transactions; and (g) diverting fraud proceeds for their personal use and benefit, and to  
7 further the fraud scheme.

8 10. During the period of the conspiracy, the defendants, secured at least 80  
9 loans in their names or the names of straw buyers, representing over \$18 million in loan  
10 proceeds, based on false and fraudulent representations. The defendants diverted a  
11 proportion of these fraudulently obtained loan proceeds for their personal benefit and use,  
12 including purchasing additional homes also through fraud, and for living expenses.

13 **C. MANNER AND MEANS OF THE CONSPIRACY**

14 11. The defendants and others used the following means and acted in the  
15 following manner, among others, to effect the conspiracy:

16 a. It was part of the conspiracy that the defendants located residential  
17 properties available for purchase. The defendants would purchase the properties in their  
18 own names, and would act as buyers for other defendants, and recruit other individuals to  
19 act as buyers of the located properties. These other individuals, otherwise known as  
20 "straw buyers," would allow their identities and credit to be used by the defendants to  
21 purchase the properties. The straw buyers had no intention of permanently owning or  
22 occupying the properties.

23 b. It was a further part of the conspiracy that the defendants paid some  
24 straw buyers for participating in purchasing selected properties and told straw buyers that  
25 they would pay for expenses associated with ownership, including mortgage payments,  
26 property taxes, and utilities during their titular ownership of the property.

27 c. It was a further part of the conspiracy that defendants and other  
28 members of the conspiracy acted at various times as a buyer, seller, buyer's real estate

1 agent, loan officer, and closing officer in the same purchase and sale transaction, without  
2 disclosing their relationship to each other and to the property.

3 d. It was a further part of the conspiracy that defendants would cause  
4 properties owned by defendants and straw buyers to be sold to other members of the  
5 conspiracy and other straw buyers, without disclosing the true relationship between the  
6 buyer and seller.

7 e. It was a further part of the conspiracy that the defendants would  
8 prepare, and cause others to prepare, Uniform Residential Loan Applications ("Loan  
9 Application") to facilitate the scheme to defraud. The Loan Application, commonly  
10 referred to as a mortgage loan application, or Form 1003, is a universally used mortgage  
11 loan application developed by federal government agencies and utilized by financial  
12 institutions and other lenders in the mortgage loan approval process. The Loan  
13 Application requires prospective borrowers to submit a complete and accurate financial  
14 history, including employment information, monthly income, assets and liabilities, details  
15 of the residential real estate transaction, and whether the property will be used as the  
16 borrower's primary residence. The Loan Application includes an "Acknowledgment and  
17 Agreement" clause, pursuant to which borrowers acknowledge that the information  
18 provided is true and correct. The defendants, and others acting on their behalf, caused the  
19 Loan Applications for themselves and the straw buyers to be prepared based upon  
20 fraudulent representations related to gross monthly income, employment status, assets and  
21 liabilities, whether the property would be used as the primary residence, and in some  
22 cases, citizenship.

23 f. It was a further part of the conspiracy that the defendants submitted,  
24 and caused to be submitted, false and fraudulent Loan Applications, together with false  
25 and fraudulent supporting documentation related to income, assets, liabilities, and  
26 employment status, to prospective lenders to secure mortgage backed financing. In most  
27 cases, the Loan Applications were submitted via interstate wire.

28 g. It was a further part of the conspiracy that the defendants submitted,

1 and caused to be submitted, documentation falsely inflating the sales price of the  
2 properties. This included, but was not limited to, false appraisals and other false  
3 documentation regarding agreements to conduct renovations and repairs which were not  
4 completed, and non-existent payments, deposits, and personal loans.

5 h. It was a further part of the conspiracy that the defendants established  
6 or invented, and controlled, businesses purporting to conduct home repairs and  
7 renovations, including *Universal Flooring*, *Marroquin Handyman Services*, and  
8 *PDQ Construction*. Defendants then submitted false and inflated invoices from these  
9 businesses to Escrow, for repairs and renovations purportedly conducted as part of  
10 purchase and sale transactions. Escrow payments made to these businesses from loan  
11 proceeds were then routed back to the defendants and others.

12 i. It was a further part of the conspiracy that defendants would obtain,  
13 and direct straw owners to obtain, using false and inflated material statements on loan  
14 applications and inflated appraisals, cash-out/refinancing loans and Home Equity Lines of  
15 Credit ("HELOC") secured by real property purchased as part of this scheme, further  
16 defrauding lenders.

17 j. It was a further part of the conspiracy that the defendants persuaded  
18 sellers to "carry-back" private loans to the buyers, secured by the property, as part of the  
19 purchase transactions. At the same time, the defendants obtained up to 100% funding  
20 through commercial lenders secured by the same property. The defendants failed to  
21 disclose, and actively concealed, these private loans from the commercial lenders, and  
22 failed to disclose, and actively concealed, the extent of the commercial loans to the sellers  
23 carrying the private notes. The excess funds were disbursed back to the defendants and  
24 other members of the conspiracy. These seller carry-back loans had the added advantage  
25 of not showing up on commercial credit checks, permitting members of the conspiracy  
26 and straw buyers to continue to borrow funds commercially without disclosing the true  
27 debt carried.

28 k. It was a further part of the conspiracy that the defendants transferred



1 ownership of some properties purchased as part of this scheme to the name of rental  
2 corporations they had established, thus concealing from lenders who might search for  
3 other properties owned by a prospective buyer the true number of properties owned and  
4 the true amount of debt carried by the prospective borrower.

5 l. It was a further part of the conspiracy that the defendants established  
6 fictitious companies by filing paperwork with the State of Washington, and then listed  
7 those fictitious companies in loan applications as a prospective borrower's employer. In  
8 some cases, the defendants solicited and obtained false verification letters, in which the  
9 prospective borrower's employment status was falsely represented.

10 m. It was a further part of the conspiracy that the defendants represented  
11 to lenders that Loan Applications and related documentation submitted on behalf of  
12 prospective purchasers/borrowers reflected complete and accurate information. Lenders  
13 extended financing via interstate wire transfers from the lender's financial institution to  
14 the escrow company in the State of Washington, on the basis of those material  
15 representations.

16 n. It was a further part of the conspiracy that the defendants created,  
17 and caused others to create, false HUD-1 Settlement Statements. HUD-1 Statements are  
18 standard forms used to facilitate the closing of residential real estate purchase and sale  
19 transactions. They are used to identify and allocate expenditures and payments associated  
20 with the transaction. Lenders rely on the accuracy of HUD-1 Statements to ensure loan  
21 proceeds are applied appropriately to protect the lender's security interest in the  
22 purchased property. Defendants, and others acting under their direction, prepared and  
23 submitted false HUD-1 Statements to lenders and sellers. False and fraudulent HUD-1  
24 Statements were used to conceal the fraud underlying the purchase and sale transaction,  
25 such as the fact that loans had been obtained in excess of the negotiated sales price.

26 o. It was a further part of the conspiracy that the defendants prepared  
27 multiple HUD-1 Statements in an effort to conceal from some sellers and lenders the true  
28 nature and extent of loans, expenditures, and payments associated with the purchase and

1 sale transaction.

2 p. It was a further part of the conspiracy that defendants received a  
3 portion of the loan proceeds for the personal benefit of the defendants and other  
4 conspirators. Loan proceeds were often distributed to and then transferred through  
5 numerous business and personal bank accounts, in order to conceal the defendants'  
6 involvement in the transaction.

7 q. It was a further part of the conspiracy that the defendants used a  
8 portion of the loan proceeds to make payments to lenders and sellers on fraudulently  
9 obtained loans to delay defaulting on the obligation and facilitate further fraud by using  
10 the acquired property for subsequent fraudulent transactions.

11 r. It was a further part of the conspiracy that the defendants undertook  
12 efforts to hide and conceal, and cause to be hidden and concealed, the purpose of the  
13 conspiracy and the acts committed in furtherance of the conspiracy.

14 **E. OVERT ACTS**

15 12. In furtherance of the conspiracy, and to accomplish its purposes and  
16 objectives, defendants, and other individuals working with them, using the manner and  
17 means described above, conducted and otherwise facilitated the following overt acts  
18 within the Western District of Washington and elsewhere, among others not listed here:

19 13. On or about August 13, 2004, ALEXIS IKILIKYAN, using the name  
20 Haikanush Ikilikyan, WILLIAM S. POFF, and MICKI S. THOMPSON at GAE caused  
21 Wachovia Mortgage to lend \$223,650, and caused the sellers, M.K. and G.K., to lend  
22 \$111,825, on the basis of false and fraudulent representations in connection with the  
23 purchase of real property located at **21908 29th Ave. S., Des Moines, Washington**, by  
24 IKILIKYAN.

25 14. On or about September 24, 2007, IKILIKYAN quit-claimed ownership of  
26 this property to *21908 29th Rental Property LLC*.

27 15. On or about September 9, 2004, ALEXIS IKILIKYAN, using the name  
28 Haikanush Ikilikyan, WILLIAM S. POFF, and MICKI S. THOMPSON at GAE caused



1 GMAC Mortgage to lend \$223,650, and caused the seller, K. Family Trust, to lend  
2 \$111,825, on the basis of false and fraudulent representations in connection with the  
3 purchase of real property located at **21914 29th Ave. S., Des Moines, Washington**, by  
4 IKILIKYAN.

5 16. On or about September 24, 2007, IKILIKYAN quit-claimed ownership of  
6 this property to *21914 29th Rental Property LLC*.

7 17. On or about September 21, 2004, ALEXIS IKILIKYAN, using the name  
8 Haikanush Ikilikyan, and MICKI S. THOMPSON at GAE caused Ownit Mortgage  
9 Solutions to lend \$243,000, and caused the seller, Y.M., to lend \$61,250, on the basis of  
10 false and fraudulent representations in connection with the purchase of real property  
11 located at **8906 Colgate Dr. West, University Place, Washington**, by IKILIKYAN.

12 18. On or about August 29, 2007, IKILIKYAN quit-claimed ownership of this  
13 property to *8906 Colgate Rental Property LLC*.

14 19. On or about January 24, 2005, ALEXIS IKILIKYAN, WILLIAM S. POFF,  
15 MICKI S. THOMPSON at GAE, and A.H. caused Ownit Mortgage Solutions to lend  
16 \$376,000 and \$94,000, on the basis of false and fraudulent representations, in connection  
17 with the purchase of real property located at **4014 52nd Street NE, Tacoma,**  
18 **Washington**, by A.H.

19 20. On or about January 4, 2007, ALEXIS IKILIKYAN, WILLIAM S. POFF,  
20 and MICKI S. THOMPSON at GAE caused Bank of American to loan \$204,640, on the  
21 basis of false and fraudulent representations, in connection with a HELOC secured by this  
22 same property, **4014 52nd Street NE, Tacoma, Washington**.

23 21. On or about March 11, 2005, ALEXIS IKILIKYAN, WILLIAM S. POFF,  
24 and A.H. caused New Century Mortgage Corporation to lend \$232,000 and \$58,000, on  
25 the basis of false and fraudulent representations, in connection with the purchase of real  
26 property located at **3202 S. 130th St., Seattle, Washington**, by A.H.

27 22. On or about September 24, 2007, A.H. quit-claimed ownership of this  
28 property to *3202 S 130th Rental Property LLC*.

23. On or about November 28, 2007, TONY REYES, ALEXIS IKILIKYAN, WILLIAM S. POFF, MICKI S. THOMPSON at GAE, and L.C. caused Pierce Commercial Bank to lend \$399,000 on the basis of false and fraudulent representations, in connection with the purchase of this same property, **3202 S. 130th St., Seattle, Washington**, by L.C.

24. On or about March 15, 2005, ALEXIS IKILIKYAN, WILLIAM S. POFF, MICKI S. THOMPSON at GAE, and A.H. caused First Bank dba First Bank Mortgage to lend \$319,200 and \$59,850, and caused the seller, CE Properties, to lend \$95,500, on the basis of false and fraudulent representations, in connection with the purchase of real property located at **4509 S. Union Street, Tacoma, Washington**, by A.H.

25. On or about September 24, 2007, A.H. quit-claimed ownership of this property to *4509 South Union Rental Property LLC*.

26. On or about April 16, 2005, ALEXIS IKILIKYAN, using the name Haikanush Ikilikyan, WILLIAM S. POFF, and MICKI S. THOMPSON at GAE caused Ownit Mortgage Solutions to lend \$292,000, on the basis of false and fraudulent representations, in connection with the purchase of real property located at **9407-9409 72nd Ave. East, Puyallup, Washington** (Pierce County Parcel No. 0420327002), by IKILIKYAN.

27. On or about June 1, 2007, IKILIKYAN transferred ownership of this property to *9707-9709 94th Rental Property LLC*.

28. On or about April 16, 2005, ALEXIS IKILIKYAN, using the name Haikanush Ikilikyan, WILLIAM S. POFF, and MICKI S. THOMPSON at GAE obtained a loan of \$292,500, on the basis of false and fraudulent representations, in connection with the purchase of real property located at **9411-9410 72nd Ave. East, Puyallup, Washington** (Pierce County Parcel No. 0420327003), by IKILIKYAN.

29. On or about August 29, 2007, IKILIKYAN quit-claimed ownership of this property to *9422-9420 94th Rental Property LLC*.

30. On or about April 16, 2005, ALEXIS IKILIKYAN, using the name

1 Haikanush Ikilikyan, WILLIAM S. POFF, and MICKI S. THOMPSON at GAE caused  
2 EMC Mortgage to lend \$292,500, on the basis of false and fraudulent representations, in  
3 connection with the purchase of real property located at **9415-9417 72nd Ave. East,**  
4 **Puyallup, Washington** (Pierce County Parcel No. 0420327004), by IKILIKYAN.

5 31. On or about August 29, 2007, IKILIKYAN transferred ownership of the  
6 property to *9415-9417 94th Rental Property LLC*.

7 32. On or about May 16, 2005, ALEXIS IKILIKYAN, WILLIAM S. POFF,  
8 MICKI S. THOMPSON at GAE, and A.H. caused American Mortgage Express to lend  
9 \$260,000 and \$32,500, on the basis of false and fraudulent representations, in connection  
10 with the purchase of real property located at **9403-9405 72nd Ave East, Puyallup,**  
11 **Washington** (Pierce County Parcel No. 0420327001), by A.H.

12 33. On a date thereafter, A.H. transferred ownership of the property to  
13 *9403-9405 72nd Ave Rental Properties LLC*.

14 34. On or about July 1, 2005, ALEXIS IKILIKYAN, WILLIAM S. POFF, and  
15 MICKI S. THOMPSON at GAE caused Aegis Wholesale Corporation to lend \$248,000,  
16 on the basis of false and fraudulent representations, in connection with the re-financing of  
17 debt secured by real property located at **1317 West Mount Drive, Fircrest, Washington,**  
18 previously purchased by IKILIKYAN.

19 35. On or about September 24, 2007, IKILIKYAN quit-claimed ownership of  
20 this property to *1317 West Mount Rental Property LLC*.

21 36. On or about July 1, 2005, ALEXIS IKILIKYAN, WILLIAM S. POFF, and  
22 MICKI S. THOMPSON at GAE caused Express Capital Lending to lend \$441,000, on the  
23 basis of false and fraudulent representations, in connection with the cash-out/refinancing  
24 of debt secured by real property located at **2703 50th Ave NE, Tacoma, Washington,**  
25 previously purchased by IKILIKYAN.

26 37. In August of 2007, ALEXIS IKILIKYAN caused Washington Mutual to  
27 lend \$150,000, on the basis of false and fraudulent representations, in connection with a  
28 HELOC secured by this same real property, **2703 50th Ave NE, Tacoma, Washington.**

1 38. On or about August 27, 2007, IKILIKYAN quit-claimed ownership of this  
2 property to *2703 50th Rental Property LLC*.

3 39. On or about October 7, 2005, ALEXIS IKILIKYAN, WILLIAM S. POFF,  
4 MICKI S. THOMPSON at GAE, and A.H. caused Express Capital Lending to lend  
5 \$101,500 and 29,000, on the basis of false and fraudulent representations, in connection  
6 with the purchase of real property located at **1719 E. 62nd St., Tacoma, Washington**, by  
7 A.H.

8 40. On or about November 1, 2005, TONY REYES and J.C. caused BNC  
9 Mortgage Inc. to lend \$160,000 and \$40,000, on the basis of false and fraudulent  
10 representations, in connection with the purchase of real property located at **21426**  
11 **Mountain Hwy E., Spanaway, Washington**, by J.C.

12 41. On or about July 26, 2006, TONY REYES and J.C. caused Impac Funding  
13 Corporation to lend \$265,600 and \$33,200, on the basis of false and fraudulent  
14 representations, in connection with a cash out/re-financing of debt secured by this same  
15 property, **21426 Mountain Hwy E., Spanaway, Washington**.

16 42. On or about December 29, 2005, ALEXIS IKILIKYAN, WILLIAM S.  
17 POFF, MICKI S. THOMPSON at GAE, and T.T. caused Ownit Mortgage Solutions, Inc.  
18 to lend \$223,950 and \$56,000, and caused the seller, J.A., to lend \$61,554, on the basis of  
19 false and fraudulent representations, in connection with the purchase of real property  
20 located at **31413 50th Ave. SW, Federal Way, Washington**, by T.T.

21 43. On or about January 31, 2006, ALEXIS IKILIKYAN, WILLIAM S. POFF,  
22 MICKI S. THOMPSON at GAE, and A.H. caused Express Capital Lending to lend  
23 \$480,000 and \$60,000, and caused the seller, X.L. to lend \$86,274, on the basis of false  
24 and fraudulent representations, in connection with the purchase of real property located at  
25 **12323 Sand Point Way NE, Seattle, Washington**, by A.H.

26 44. On or about December 12, 2006, TONY REYES, ALEXIS IKILIKYAN,  
27 WILLIAM S. POFF, MICKI S. THOMPSON at GAE, MARIO A. MARROQUIN, and  
28 A.H. caused Just Mortgage Inc. to lend \$500,000, on the basis of false and fraudulent

1 representations, in connection with the purchase of this same property, **12323 Sand Point**  
2 **Way NE, Seattle, Washington**, by MARIO A. MARROQUIN, from A.H.

3 45. On or about April 20, 2006, TONY REYES, ALEXIS IKILIKYAN,  
4 MICKI S. THOMSON at GAE, and J.O. caused Cameron Financial Group, Inc. to lend  
5 \$218,400 and \$54,600, on the basis of false and fraudulent representations, in connection  
6 with the purchase of real property located at **20730 Des Moines Memorial Dr., Seatac,**  
7 **Washington**, by J.O.

8 46. In or about January of 2007, TONY REYES, ALEXIS IKILIKYAN, and  
9 J.O. caused Bank of America to lend \$85,600, on the basis of false and fraudulent  
10 representations, through a cash-out/refinancing of debt secured by this same property,  
11 **20730 Des Moines Memorial Dr., Seatac, Washington**.

12 47. On or about March 12, 2007, TONY REYES, ALEXIS IKILIKYAN, and  
13 J.O. caused Impac Lending to lend \$218,400 from Impac Lending, on the basis of false  
14 and fraudulent representations, through a refinancing of debt secured by this same  
15 property, **20730 Des Moines Memorial Dr., Seatac, Washington**.

16 48. On or about June 19, 2006, TONY REYES, MICKI S. THOMPSON at  
17 GAE, and J.C. caused Greenpoint Mortgage Funding, Inc. to lend \$153,000, on the basis  
18 of false and fraudulent representations, in connection with the purchase of real property  
19 located at **1426 E. 34th Street, Tacoma, Washington**, by J.C.

20 49. On or about June 26, 2006, TONY REYES and J.C. caused Just Mortgage,  
21 Inc. to lend \$132,000 and \$16,500 from Just Mortgage, Inc., on the basis of false and  
22 fraudulent representations, in connection with the purchase of real property located at  
23 **2231 E. 35th Street, Tacoma, Washington**, by J.C.

24 50. On or about June 29, 2006, TONY REYES, ALEXIS IKILIKYAN,  
25 WILLIAM S. POFF, MICKI S. THOMPSON at GAE, and J.C. caused Bear Stearns  
26 Residential Mortgage Corp. to lend \$387,600 and \$96,900, on the basis of false and  
27 fraudulent representations, in connection with the purchase of real property located at  
28 **3821 South 345th St., Auburn, Washington**, by J.C. from IKILIKYAN.

1 51. On or about July 5, 2006, TONY REYES, M.N., and L.D. caused  
 2 Homecomings Financial to lend \$238,800 and \$29,950.00, on the basis of false and  
 3 fraudulent representations, in connection with the purchase of real property located at  
 4 **11706 123rd Ave. E., Puyallup, Washington**, by L.D.

5 52. On or about July 6, 2006, TONY REYES and J.O. caused Just Mortgage  
 6 Inc. to lend \$219,200 and \$27,400 from Just Mortgage Inc., on the basis of false and  
 7 fraudulent representations, in connection with the purchase of real property located at  
 8 **20826 4th Pl. S., Des Moines, Washington**, by J.O.

9 53. On or about July 14, 2006, TONY REYES, MICKI S. THOMPSON at  
 10 GAE, and J.O. caused Just Mortgage Inc. to lend \$255,200 and \$31,900, on the basis of  
 11 false and fraudulent representations, in connection with the purchase of real property  
 12 located at **10812 44th Ave. E., Tacoma, Washington**, by J.O.

13 54. On or about November 26, 2007, TONY REYES, MICKI S. THOMPSON  
 14 at GAE, J.O., and Y.M. caused Pierce Commercial Bank to lend \$342,000, on the basis of  
 15 false and fraudulent representations, in connection with the purchase of this same  
 16 property, **10812 44th Ave. E., Tacoma, Washington**, by Y.M. from J.O.

17 55. On or about July 21, 2006, TONY REYES, MICKI S. THOMPSON at  
 18 GAE, M.N., and J.R. caused Bear Stearns Residential Mortgage Corp. to lend \$188,000  
 19 and \$47,000, on the basis of false and fraudulent representations, in connection with the  
 20 purchase of real property located at **12701 NE 9th Place #D102, Bellevue, Washington**,  
 21 by J.R.

22 56. On or about July 23, 2006, J.R. quit-claimed ownership of this property,  
 23 **12701 NE 9th Place #D102, Bellevue, Washington**, to M.N.

24 57. On or about July 27, 2006, ALEXIS IKILIKYAN, WILLIAM S. POFF,  
 25 MICKI S. THOMPSON at GAE, and A.H. caused Ownit Mortgage Solutions to lend  
 26 \$346,500, and caused Ocwen Loan to lend \$23,302, and caused the seller, L.J., to lend  
 27 \$58,000, on the basis of false and fraudulent representations, in connection with the  
 28 purchase of real property located at **20613 11th Ave. S., Seattle, Washington**, by A.H.



1 58. On or about July 28, 2006, ALEXIS IKILIKYAN, WILLIAM S. POFF,  
2 MICKI S. THOMPSON at GAE, and A.H. caused Ownit Mortgage Solutions to lend  
3 \$301,500, on the basis of false and fraudulent representations, in connection with the  
4 purchase of real property located at **13841 SE 180th St., Renton, Washington**, by A.H.

5 59. On or about August 11, 2006, TONY REYES, ALEXIS IKILIKYAN,  
6 WILLIAM S. POFF, MICKI S. THOMPSON at GAE, and J.C. caused Just Mortgage Inc.  
7 to lend \$200,000 and \$25,000, on the basis of false and fraudulent representations, in  
8 connection with the purchase of real property located at **8715 Dolly Madison St. SW,**  
9 **Lakewood, Washington**, by J.C.

10 60. On or about August 25, 2006, TONY REYES and J.C. caused Mortgage It  
11 to lend \$328,500, on the basis of false and fraudulent representations, in connection with  
12 the purchase of real property located at **211 Columbia Ave., Fircrest, Washington**, by  
13 J.C.

14 61. On or about September 11, 2006, TONY REYES and J.O. caused Ampro  
15 Mortgage, a Division of United Financial Mortgage Corp. to lend \$292,000 and \$36,500,  
16 on the basis of false and fraudulent representations, in connection with the purchase of  
17 real property located at **219 Columbia Ave., Fircrest, Washington**, by J.O.

18 62. On or about September 12, 2006, TONY REYES and L.D. caused  
19 Mortgage IT to lend \$400,500, on the basis of false and fraudulent representations, in  
20 connection with the purchase of real property located at **10606 34th Ave. E., Tacoma,**  
21 **Washington**, by L.D.

22 63. On or about October 17, 2006, TONY REYES and MARIO A.  
23 MARROQUIN caused Just Mortgage Inc. to lend \$230,400 and \$26,600, on the basis of  
24 false and fraudulent representations, in connection with the purchase of real property  
25 located at **3534 S. 263rd, Kent, Washington**, by MARROQUIN.

26 64. On or about November 1, 2006, ALEXIS IKILIKYAN, MICKI S.  
27 THOMPSON at GAE, and J.S. caused Ownit Mortgage Solutions to lend \$420,000 and  
28 \$105,000, on the basis of false and fraudulent representations, in connection with the

1 purchase of real property located at **27831 37th Ave. S., Auburn, Washington**, by J.S.

2 65. On or about December 5, 2006, TONY REYES and MARIO A.  
3 MARROQUIN caused Impac Funding Corporation to lend \$631,200 and \$157,800, on  
4 the basis of false and fraudulent representations, in connection with the purchase of real  
5 property located at **22630 94th Ave. S., Kent, Washington**, by MARROQUIN.

6 66. On or about July 30, 2007, TONY REYES and MARIO A. MARROQUIN  
7 caused National City Bank to lend \$307,375, on the basis of false and fraudulent  
8 representations, through a re-financing of debt secured by this same property, **22630 94th**  
9 **Ave. S., Kent, Washington**.

10 67. On or about February 1, 2007, TONY REYES, ALEXIS IKILIKYAN, and  
11 MICKI S. THOMPSON at GAE caused Aurora Home Services to lend \$356,000, on the  
12 basis of false and fraudulent representations, through a cash-out/refinancing of debt  
13 secured by real property located at **8101 S. 19th St., Tacoma, Washington**.

14 68. On or about June 1, 2007, IKILIKYAN quit-claimed ownership of this  
15 property to *8101 South 19th Rental Property, LLC*.

16 69. On or about February 14, 2007, TONY REYES, ALEXIS IKILIKYAN,  
17 WILLIAM S. POFF, MICKI S. THOMPSON at GAE, and MARIO A. MARROQUIN  
18 caused Greenpoint Mortgage Funding, Inc. to lend \$1,406,250, and caused National City  
19 Bank to lend \$187,500, on the basis of false and fraudulent representations, in connection  
20 with the purchase of real property located at **9488 199th Ave. SE, Issaquah,**  
21 **Washington**, by IKILIKYAN and POFF.

22 70. On or about February 23, 2007, POFF quit-claimed his ownership in this  
23 property, **9488 199th Ave. SE, Issaquah, Washington**, to IKILIKYAN.

24 71. On or about March 7, 2007, ALEXIS IKILIKYAN and MICKI S.  
25 THOMPSON at GAE applied some of the proceeds obtained in connection with the  
26 purchase of **9488 199th Ave. SE, Issaquah, Washington**, described above, to the  
27 purchase of real property located at **7038 S. Puget Sound Ave., Tacoma, Washington**.

28 72. On or about March 21, 2007, ALEXIS IKILIKYAN and MICKI S.

1 THOMPSON at GAE caused National City Bank to lend \$350,000, on the basis of false  
2 and fraudulent representations, through a cash-out/refinancing of debt secured by **9488**  
3 **199th Ave. SE, Issaquah, Washington.**

4 73. On or about March 12, 2007, TONY REYES, ALEXIS IKILIKYAN,  
5 WILLIAM S. POFF, MICKI S. THOMPSON at GAE, and A.H. caused Just City  
6 Mortgage to lend \$1,000,000 and \$200,000, and caused the sellers, C.K. and S.K. to lend  
7 \$305,000, on the basis of false and fraudulent representations, in connection with the  
8 purchase of real property located at **27419 8th Ave. S., Des Moines, Washington,** by  
9 A.H.

10 74. On December 18, 2007, ALEXIS IKILIKYAN, WILLIAM S. POFF, and  
11 A.H. caused Boeing Employees Credit Union to lend \$239,764, on the basis of false and  
12 fraudulent representations, through a HELOC secured by this same property, **27419 8th**  
13 **Ave. S., Des Moines, Washington.**

14 75. On or about April 28, 2007, TONY REYES, MICKI S. THOMPSON at  
15 GAE, MARIO A. MARROQUIN, and Y.M. caused Ampro Mortgage to lend \$240,300,  
16 and caused the sellers, T.B. and B.B. to lend \$53,400, on the basis of false and fraudulent  
17 representations, in connection with the purchase of real property located at **116 Homer**  
18 **Ave., Pacific, Washington,** by MARROQUIN and Y.M.

19 76. On or about May 18, 2007, MARIO A. MARROQUIN quit claimed his  
20 interest in this property, **116 Homer Ave., Pacific, Washington,** to Y.M.

21 77. On or about August 14, 2008, TONY REYES, ALEXIS IKILIKYAN,  
22 WILLIAM S. POFF, and MICKI S. THOMPSON at GAE facilitated the sale of **7038 S.**  
23 **Puget Sound Ave., Tacoma, Washington,** from IKILIKYAN to L.H.

24 78. On or about August 19 and 20, 2008, ALEXIS IKILIKYAN, WILLIAM S.  
25 POFF, and MICKI S. THOMPSON at GAE caused some of the proceeds of the sale of  
26 **7038 S. Puget Sound Ave., Tacoma, Washington,** to be transferred via interstate wire  
27 from a GAE bank account in the State of Washington to a bank account in the State of  
28 Michigan.

1 79. On or about February 1, 2008, TONY REYES, ALEXIS IKILIKYAN,  
2 WILLIAM S. POFF, MICKI S. THOMPSON at GAE, MARIO A. MARROQUIN, and  
3 A.H. caused ING Mortgage to lend \$1,031,250, on the basis of false and fraudulent  
4 representations, in connection with the purchase of real property located at 3825 S. 345th  
5 St, Auburn, Washington, by A.H.

6 80. At various times between April 4, 2005, and February 12, 2008,  
7 ALEXIS IKILIKYAN paid at least \$10,500 to MICKI S. THOMPSON in the form of  
8 personal checks.

9 81. At various times between April 4, 2005, and February 12, 2008,  
10 MICKI S. THOMPSON endorsed the checks from IKILIKYAN and deposited them into  
11 her personal bank account.

12 All in violation of Title 18, United States Code, Section 1349.

13  
14 **COUNT TWO**  
**(18 U.S.C. § 1956(h) - Conspiracy to Engage in Money Laundering)**

15 82. The factual allegations contained in paragraphs one through fifty-four are  
16 realleged and incorporated by reference as though fully set forth herein.

17 83. Beginning at a time unknown, but not later than August of 2004, and  
18 continuing through at least February of 2009, in King, Pierce, and Snohomish Counties,  
19 within the Western District of Washington, and elsewhere, the defendants, HUMBERTO  
20 A. REYES-RODRIGUEZ, a/k/a TONY REYES, ALEXIS IKILIKYAN, a/k/a Haikanush  
21 Ikilikyan, WILLIAM S. POFF, MICKI S. THOMPSON, and MARIO A. MARROQUIN,  
22 and others known and unknown, unlawfully and knowingly combined, conspired,  
23 confederated and agreed together and with each other, to commit certain offenses under  
24 Title 18, United States Code, Sections 1956 and 1957, as follows:

25 **(1956(a)(1))**

26 84. Did conduct and attempt to conduct financial transactions, affecting  
27 interstate or foreign commerce, which in fact involved the proceeds of specified unlawful  
28 activity, that is, conspiracy to commit wire fraud and bank fraud, in violation of Title 18,

1 United States Code, Section 1349, as alleged in Count One, above, knowing that the  
 2 property involved in the financial transactions represents the proceeds of some form of  
 3 unlawful activity –

4 (A) with the intent to promote the carrying on of the specified unlawful activity,  
 5 in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

6 (B) knowing that the transactions are designed in whole or in part –

7 (i) to conceal and disguise the nature, the location, the source, the  
 8 ownership, and the control of the proceeds of the specified unlawful activity, in violation  
 9 of Title 18, United States Code, Section 1956(a)(1)(B)(i).

10 (1957)

11 85. Did, within the United States, knowingly engage and attempt to engage in  
 12 monetary transactions, in or affecting interstate or foreign commerce, involving  
 13 criminally derived property of a value greater than \$10,000 and which is derived from  
 14 specified unlawful activity, that is conspiracy to commit wire fraud and bank fraud, in  
 15 violation of Title 18, United States Code, Section 1349, as alleged in Count One, above,  
 16 in violation of Title 18, United States Code, Section 1957(a).

17 The grand jury further alleges that offense was committed during and in furtherance of  
 18 the conspiracy charged in Count 1.

19 All in violation of Title 18, United States Code, Section 1956(h).

20 **ALLEGATION OF FORFEITURE**

21 86. The Grand Jury realleges and incorporates by reference the allegations in  
 22 Counts One and Two of this Indictment for the purpose of alleging forfeiture to the  
 23 United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and  
 24 982(a)(1), and Title 28, United States Code, Section 2461(c).

25 87. Upon conviction of the offenses alleged in Counts One and Two,  
 26 Defendants HUMBERTO A. REYES-RODRIGUEZ, a/k/a Tony Reyes, ALEXIS  
 27 IKILIKYAN, a/k/a Haikanush Ikilikyan, WILLIAM S. POFF, MICKI S. THOMPSON,  
 28 and MARIO A. MARROQUIN shall forfeit to the United States any property, real and

1 personal, which was involved in the offense, or which constitutes or is derived from  
 2 proceeds traceable to the aforesaid offenses, including but not limited to the following  
 3 property:

4 a. A sum of money representing the amount of proceeds obtained as a result of  
 5 the offense alleged in Count 1, above, for which the defendants are jointly and severally  
 6 liable.

7 b. Bank of America checking account \*\*\*\*4089, in the name of Haikanush  
 8 Ikilikyan, and all contents therein.

9 c. Washington Mutual Bank account 387-\*\*\*313-5, in the name of Alexis H  
 10 Ikilikyan, and all contents therein.

11 d. Washington Mutual Bank account 441-\*\*\*131-4, in the name of *The*  
 12 *Plantation LLC*, and all contents therein.

13 e. Washington Mutual Bank account 314-\*\*\*295-7, in the name of Humberto  
 14 A Reyes-Rodriguez dba *Universal Flooring*, and all contents therein.

15 f. Wells Fargo Bank account 731-\*\*\*4658, in the name of Mario A & Y.E.  
 16 Marroquin, and all contents therein.

17 g. A Ford F-350 (VIN 1FTWW31P25EC44328), registered to Alexis  
 18 Ikilikyan.

19 h. A Mercedes 430 (VIN WDBJF70J3YB028281), registered to Alexis  
 20 Ikilikyan.

#### 21 SUBSTITUTE ASSETS

22 88. As to all criminal forfeiture allegations, if any of the above-described  
 23 forfeitable property, as a result of any act or omission of the Defendants:

- 24 i. cannot be located upon the exercise of due diligence;
- 25 ii. has been transferred or sold to, or deposited with, a third party;
- 26 iii. has been placed beyond the jurisdiction of the Court;
- 27 iv. has been substantially diminished in value; or
- 28 v. has been commingled with other property which cannot be subdivided



1 without difficulty;

2 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
3 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek  
4 forfeiture of any other property of the Defendants up to the value of the above-described  
5 forfeitable properties.

6  
7 A TRUE BILL

8 DATED: 5/21/2009

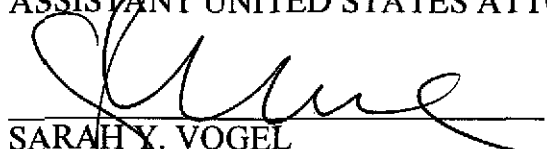
9 *Signature of the Foreperson redacted*  
10 *pursuant to the policy of the Judicial Conference*

11 FOREPERSON

12   
13 JEFFREY C. SULLIVAN  
14 UNITED STATES ATTORNEY

15   
16 DOUGLAS B. WHALLEY  
17 ASSISTANT UNITED STATES ATTORNEY

18   
19 DARWIN P. ROBERTS  
20 ASSISTANT UNITED STATES ATTORNEY

21   
22 SARAH Y. VOGEL  
23 ASSISTANT UNITED STATES ATTORNEY